Wanda L. Ellert **PROSKAUER ROSE LLP**

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Attorneys for Defendant Church & Dwight Co., Inc.

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

MELISSA FOGARTY, On Behalf of Herself and All Others Similarly Situated,

Plaintiff,

-against-

CHURCH & DWIGHT, INC.; THE PROCTOR & GAMBLE COMPANY, INC.; REVLON, INC.; THE DIAL CORPORATION; and HENKEL CORPORATION,

Defendants.

Civ. Action No. 3:14-CV-07086 (FLW) (DEA)

DECLARATION OF WANDA L. ELLERT IN SUPPORT OF CHURCH & DWIGHT CO., INC.'S MOTION TO DISMISS THE COMPLAINT

- I, Wanda L. Ellert, declare as follows:
- I am Senior Counsel at the law firm Proskauer Rose LLP, counsel for Defendant Church & Dwight Co., Inc. ("Church & Dwight") (incorrectly sued as "Church & Dwight, Inc."). I am admitted in the District of New Jersey.
- 2. I submit this Declaration in support of Defendant Church & Dwight's Motion To Dismiss Plaintiff's Class Action Complaint. The purpose of this Declaration is to place before the Court documents cited in Church & Dwight's accompanying Memorandum of Law and Plaintiff's Complaint.

- 3. Attached as Exhibit 1 is a true and correct copy of the front and back labels of Church & Dwight's Arm & Hammer[®] EssentialsTM Unscented Deodorant.
- 4. Attached as Exhibit 2 is a true and correct copy of the front and back labels of Church & Dwight's Arm & Hammer UltraMaxTM Unscented Antiperspirant Deodorant
- 5. Attached as Exhibit 3 is a true and correct copy of the Drugstore.com webpage for Church & Dwight, Co., Inc.'s Arm & Hammer Essentials Unscented Deodorant with the ingredients listed.

I declare under penalty of perjury that the following is true and correct. February 20, 2015.

/s/ Wanda L. Ellert

Wanda L. Ellert

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EXHIBIT 1







EXHIBIT 2

311





EXHIBIT 3





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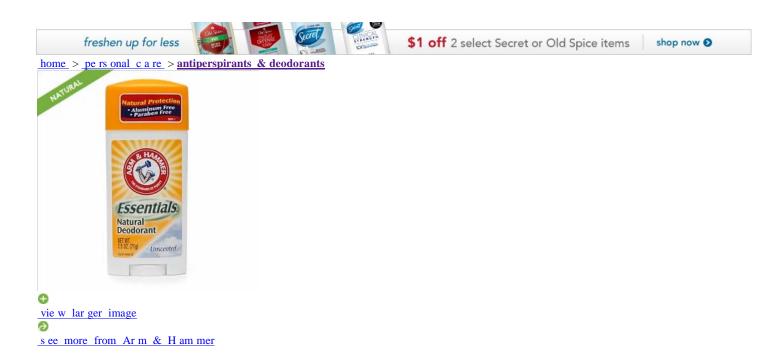
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Arm & Hammer Essentials Deodorant with Natural Deodorizers, Unscented 2.5 oz $(71~{\rm g})$



Dipropylene Glycol, Water, Propylene Glycol, Sodium Stearate, Sodium Bicarbonate (Baking Soda) (Baking Soda), Chamomilla (Anthemis Nobilis) Oil, Coriandrum Sativum (Coriander) Seed Oil, Pelargonium Graveolens (Geranium) Flower Oil, Citrus Aurantium Amara (Orange) Oil, Triethyl

Citrate, Triclosan, Tetrasodium EDTA, Allantoin (Comfrey Root)

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